REMARKS

Claims 1 and 4 remain pending in the application. Claims 2 - 3 and 5 - 25 were previously cancelled from the application without prejudice. The rejection of Claims 1 and 4 is respectfully traversed below.

Applicants are _not_ conceding that the subject matter encompassed by the claims as presented prior to this Amendment is not patentable over the art cited by the Examiner, as claim amendments and cancellations in the present application are directed toward facilitating expeditious prosecution of the application and allowance of the currently-presented claims at an early date. Applicants respectfully reserve the right to pursue claims, including the subject matter encompassed by the claims as presented prior to this Amendment and additional claims, in one or more continuing applications.

I.   Rejection under 35 U. S. C. §102(e)

Paragraph 4 of the Office Action dated September 17, 2008 (hereinafter, "the Office Action") states that Claims 1 and 4 are rejected under 35 U.S.C. §102(e) as being unpatentable over U. S. Patent No. 7,139,766 to Thomson et al. (hereinafter, "Thomson"). This rejection is respectfully traversed with regard to remaining Claims 1 and 4 as currently presented.

Thomson is directed to a method for mapping data in context from one presentation to another and provides a universal drill-through system (UDS) for allowing context of one report or presentation to be passed to another report regardless of the originating and target databases and

query tools (see Abstract and column 3, lines 3 - 23).

Lines 5 - 6 of independent Claim 1 recite "programmatically determining a current context of a user of a device on which the Web page is rendered". Relative to this subject matter, the Office Action cites column 3, lines 3 - 27. Exactly what in this passage discloses this subject matter is not specified. However, the passage includes no discussion of the current context of a user. No device is specified in this passage. The passage generally describes the UDS and that context, *the context apparently being of data in a target database*, can be passed to another report or presentation. The current context of a user of a device is not disclosed, taught or suggested.

Lines 6 - 8 of Claim 1 recite "the current context comprising at least one of: an identification of the user; a role of the user; the device used by the user; a geographical location of the user; and preferences of the user". While this subject matter directly extends the recitation of Claim 1 from lines 5 - 6 as discussed above, a totally different passage from Thomson is employed to reject this subject matter. Column 11, lines 11 - 20 describes how a user selects a document form a list of target documents from a browser. There is no description of the identification of a user. There is no description of the role of the user. There is no description of the device used by the user (other than that a browser is employed, but software is generally not considered a device, and there is no discussion of this in the Office Action). There is certainly no description of the geographic location of the user or the preferences of the user. Accordingly, Applicants submit that this subject matter is not taught, suggested or disclosed by Thomson. The Office Action

also alleges that column 11, lines 11 - 20 also discloses the subject matter of lines 9 - 10 of Claim 1, which recites "programmatically determining a plurality of content values specified in the Web page". Per this passage of Thomson, translated drilled data is retrieved and current drill context is extracted. There is no discussion of content values in this passage of Thomson.

Lines 9 - 10 of Claim 1 recite "programmatically determining a plurality of content values specified in the Web page". Relative to this subject matter, the Office Action cites column 5, lines 1 - 15. No Web page is discussed in this passage (a database is referred to). No content values are discussed in this passage.

Numerous other differences exist between Claim 1 and Thomson. As stated by the Court of Appeals for the Federal Circuit, "Anticipation under 35 U.S.C. §102 requires the disclosure in a single price of prior art of <u>each and every limitation</u> of a claimed invention." *Apple Computer Inc. v. Articulate Sys. Inc.,* 57 U.S.P.Q.2d 1057, 1061 (Fed. Cir. 2000), emphasis added. In another case, the Court of Appeals stated that a finding of anticipation requires that there must be <u>no difference</u> between the claimed invention and the disclosure of the cited reference as viewed by one of ordinary skill in the art. See *Scripps Clinic & Research Foundation v. Genentech Inc.,* 927 F.2d 1565, 1576, 18 U.S.P.Q.2d 1001, 1010 (Fed. Cir. 1991). In yet another case, the Court of Appeals held that a finding of anticipation requires <u>absolute identity</u> for <u>each and every element</u> set forth in the claimed invention. See *Trintec Indus. v. Top-U.S.A. Corp.,* 63 U.S.P.Q.2d 1597 (Fed. Cir. 2002).

Since Applicants have identified a large number of elements of Claim 1 that are not taught, suggested or disclosed by Thomson, Claim 1 clearly patentably distinguishes over Thomson.

Dependent Claim 4 is deemed patentable by virtue of (at least) the patentability of independent Claim 1 from which it depends.

Differences clearly exist between the dependent Claim 4 and Thomson such that Thomson clearly does not disclose the claimed subject matter. For example, lines 4 - 5 of Claim 4 recite "using the programmatically-determined current context and at least one of the obtained query parameter names to consult a mapping, thereby obtaining a related query parameter name". Relative to this subject matter, the Office Action cites column 13, lines 20 - 25 of Thomson. This passage refers to Figure 9, and states that Figure 9 illustrates an example of:

> "a report 900 having table data 902 in the top half of the screen and a bar graph 904 of the data in the lower portion of the screen. The table comprises a plurality of rows, such as indicated at 906, and columns such as indicated at 908. Tow and column dimension cells 910 and 912, respectively, are the business entities that appear on the row and column headings of a query result cells."

There is no discussion of the current context in this passage. There is no discussion of obtained query parameter names in this passage. No related query parameter name is taught, suggested or disclosed. Accordingly, Applicants submit that dependent Claim 4 further distinguishes over Thomson.

The Examiner is therefore respectfully requested to withdraw the §103 rejection of all

claims as currently presented.

II.   Conclusion

Applicants respectfully request reconsideration of the pending rejected claims, withdrawal

of all presently outstanding rejections, and allowance of all remaining claims at an early date.

Respectfully submitted,

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